

# CREW | citizens for responsibility and ethics in washington

September 20, 2017

**VIA ECF**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

Re: *Doyle, et al. v. U. S. Department of Homeland  
Security, et al.*, No. 17-2542 (KPF)

Dear Judge Failla,

Plaintiffs in the above-referenced action, Kate Doyle, National Security Archive, Citizens for Responsibility and Ethics in Washington, and Knight First Amendment Institute at Columbia University, respectfully request that the Court schedule a hearing on their Motion for an Order Requiring that Defendants Show Cause for Failing to Comply with the Court's July 14 Order (Dkt. 33).

As plaintiffs' memorandum in support of its motion (Dkt. 33-1) explains, the Court, plaintiffs, and the citizens whose interest in transparency is ultimately served by the Freedom of Information Act deserve an explanation for the government's decision not to produce all responsive and non-exempt Mar-a-Lago records, in contravention of this Court's July 14 order. Plaintiffs respectfully submit that the government's explanation for its sudden about-face should be made on the record and directly to the Court. Plaintiffs further submit that an in-person appearance will expedite the Court's determination if any sanctions are appropriate and help avoid further unnecessary delays in this case.

Respectfully,

s/ Anne L. Weismann

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